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March 18, 2025

**Via ECF**

Hon. Georgette Castner, U.S.D.J.  
District Court of New Jersey  
Clarkson F. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

**RE: *United States ex rel. Andriola v. Ferreira Construction Co., Inc., et al.***  
**Docket No. 3:23-cv-03834**

Dear Judge Castner:

This firm, along with Trif & Modugno LLC, represents Defendants Ferreira Construction Co., Inc. (“FCC”), American Pile and Foundation LLC (“APF”), Valiant Energy Services LLC (“VES”), Valiant Power Group, Inc. d/b/a SM Electric Group, Inc. (“VPG”), and Nelson Ferreira (collectively, “Defendants”) in the above matter.

Currently pending before the Court is Defendants’ motion to dismiss. On February 7, 2025, the Court entered a Letter Order setting a briefing schedule for the motion, with motion opposition to be filed by March 14, 2025, and Defendants’ reply due March 28, 2025. (ECF 32). On March 13, 2025, the Government filed a consent motion requesting an extension of time to April 4, 2025, to file a Statement of Interest with respect to a portion of Defendants’ motion to dismiss. (ECF 35). In light of the Government’s participation and request for an extension, Defendants request an extension to April 18, 2025, to file one reply brief in response to Plaintiff’s opposition to the motion and the Government’s statement of interest. Plaintiff consents to Defendants’ requested extension. Finally, Defendants request the Court’s permission to file an overlength reply brief not to exceed 20 pages due to the need to respond to both Plaintiff’s opposition and the Government’s Statement of Interest.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Robert C. Scrivo  
Robert C. Scrivo

cc: All Defense Counsel of Record (*via ECF*)